

Edward A. Keane*
Cornelius A. Mahoney*
Garth S. Wolfson*

Jorge A. Rodriguez*†

Of Counsel
Stephen J. Murray

*Also admitted in NJ

†Also admitted in CT

MAHONEY & KEANE, LLP

Attorneys at Law

111 Broadway, Tenth Floor

New York, New York 10006

Telephone (212) 385-1422

Facsimile (212) 385-1605

lawoffices@mahoneykeane.com

Connecticut Office

14 Pilgrim Lane

Weston, CT 06883

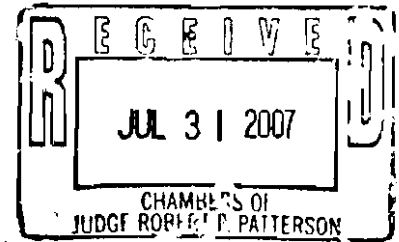
Tel: (203) 222-1019

Fax: (203) 222-0252

July 31, 2007

BY HAND

THE HON. ROBERT P. PATTERSON
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Chambers 2550
New York, New York 10007



Re: **SDNY Case No's:**

07 Civ. 959 (RPP)

07 Civ. 2562 (RPP)

07 Civ. 3104 (RPP)

07 Civ. 6008 (RPP)

Indemnity Ins. Co. of N.

Am. v. C.U. Transp.,

Inc., & Related Actions

M/V EASLINE TIANJIN

Our File No.: 12/3368

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/1/07

MEMO

ENDORSE

Honorable Sir:

We represent defendant KAWASAKI KISEN KAISHA LTD. (K-LINE) in the above-referenced actions. Pursuant to Your Honor's individual rules of practice and the July 31, 2007 deadline previously set by the Court, we enclose courtesy copies of K-LINE's Notice of Motion to dismiss pursuant to the forum-selection agreement contained in the K-LINE bill of lading, as well as a supporting Declaration and Memorandum of Law.

However, we have learned that additional claims, including, but perhaps not limited to, the action now pending under 07 Civ. 6008, have been or shortly will be filed in connection with this loss, and K-LINE's time to answer them has not yet even run. But we believe the resolution of the additional claims, as far as the United States proceedings are concerned, would likely be guided by the Your Honor's decision on the enclosed motion, in any event.

Accordingly, we request that K-LINE's time to move with respect to venue in the new claims be extended until 30 days from the time of the Court's ruling on the pending motion.

*Application
granted
So ordered
Robert P. Patterson
7/31/07 USDC*

We thank the Court for its consideration.

Respectfully submitted,

MAHONEY & KEANE, LLP

By: 
Garth S. Wolfson

cc (via fax, w/out encl's):

DAVID L. MAZAROLI, ESQ.
11 Park Place
New York, New York 10005
Fax: (212) 732-7352

McDERMOTT & RADZIK, LLP
Wall Street Plaza
88 Pine Street
New York, New York 10005
Fax: (212) 376-6490

BADIAK & WILL, LLP
106 Third Street
Mineola, New York 11501
Fax: (516) 877-2230

CASEY & BARNETT LLC
317 Madison Avenue, 21st Floor
New York, New York 10017
Fax: (212) 286-0261

CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR LLP
61 Broadway, 30th Floor
New York, New York
Fax: (212) 344-7285

HILL RIVKINS & HAYDEN, LLP
45 Broadway, Suite 1500
New York, New York 10006
Fax: (212) 669-0698